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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF PATRICK  
SCHMIDT IN SUPPORT OF PLAINTIFF  
WAYMO LLC'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL ITS  
MOTION FOR PROTECTIVE ORDER  
OVER PORTIONS OF THE STROZ DUE  
DILIGENCE REPORT AND  
SUPPORTING DECLARATION**

1 I, Patrick Schmidt, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo's Administrative Motion to File Under  
7 Seal Its Motion For Protective Order Over Certain Exhibits To The Stroz Due Diligence Report And  
8 Supporting Declaration ("Administrative Motion").

9 3. The Administrative Motion to File Under Seal seeks an order sealing the following  
10 materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Motion For Protective Order Over Certain Exhibits To The Stroz Due Diligence Report	Entire Document	Defendants
Declaration of Patrick Schmidt in Support of Motion for Protective Order and Exhibit A thereto	Entire Document	Defendants

16 4. Waymo only seeks the Motion and the information in this Declaration because Waymo  
17 believes such information is considered confidential or non-public by Defendants. Such information  
18 appears throughout these documents, necessitating that they be filed completely under seal. Waymo  
19 expects one or more of the Defendants to make a motion to support sealing this additional  
20 information.  
21

22 I declare under penalty of perjury under the laws of the State of California and the United  
23 States of America that the foregoing is true and correct, and that this declaration was executed in Los  
24 Angeles, California, on September 19, 2017.

25 By /s/ Patrick Schmidt

26 Patrick Schmidt

27 Attorney for WAYMO LLC  
28

**SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Patrick Schmidt.

/s/ Charles K. Verhoeven  
Charles K. Verhoeven